

1 Christina Goodrich (SBN 261722)
2 christina.goodrich@klgates.com
Connor J. Meggs (SBN 336159)
2 connor.meggs@klgates.com
3 **K&L GATES LLP**
4 10100 Santa Monica Boulevard
Eighth Floor
Los Angeles, California 90067
Telephone: +1 310 552 5000
5

6 James A. Shimota (*admitted pro hac vice*)
jim.shimota@klgates.com
7 **K&L GATES LLP**
70 W. Madison Street
Suite 3300
8 Chicago, Illinois 60602
Telephone: +1 312 807 4299
9

10 Darlene F. Ghavimi (*admitted pro hac vice*)
darlene.ghavimi@klgates.com
11 **K&L GATES LLP**
2801 Via Fortuna
Suite #650
12 Austin, Texas 78746
13

Attorneys for Plaintiff
Entropic Communications, LLC
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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 ENTROPIC COMMUNICATIONS,
LLC,

18 Plaintiff,

19 v.

20 DISH Network Corporation, *et al.*,

21 Defendants.

22 Case No.: 2:23-cv-01043-JWH-KES

**JOINT STATUS REPORT RE
CONSOLIDATION AND
APPOINTMENT OF SPECIAL
MASTER RE DISCOVERY**

Hearing Date: June 9, 2023
Hearing Time: 11:00 a.m.
Courtroom: 9D (Santa Ana)
Judge: Hon. J. W. Holcomb

1 Plaintiff Entropic Communications, LLC (“Plaintiff” or “Entropic”), and
 2 Defendants DISH Network Corporation, DISH Network L.L.C., Dish Network
 3 Service, L.L.C., and Dish Network California Service Corporation (collectively
 4 “Defendants”) (jointly with Plaintiff, the “Parties”) hereby submit the following
 5 Joint Status Report pursuant to the Court’s May 17, 2023 Scheduling Notice and
 6 Order [ECF Dkt. No. 55] directing the Parties to file an update regarding case
 7 consolidation and the appointment of a Special Master.

8 **I. THE PARTIES’ POSITION REGARDING CONSOLIDATION**

9 With respect to consolidation, the Parties reiterate their respective positions
 10 stated in the March 10, 2023 Joint Response to Order to Show Cause Regarding
 11 Consolidation [ECF Dkt. No. 26], whereby the Parties agreed, for pretrial purposes,
 12 to consolidate Case Nos. 2:23-cv-01048-JWH-KES, 2:23-cv-01043-JWH-KES, and
 13 2:23-cv-01047-JWH-KES through the *Markman* hearing. Since that time,
 14 Defendants DISH Network Corporation, DISH Network L.L.C., and Dish Network
 15 Service L.L.C. have filed a motion to dismiss pursuant to Rule 12(b)(3), and the
 16 Parties agree that the agreement to consolidate is without waiver and without
 17 prejudice to that pending motion to dismiss [ECF Dkt. No. 49]. In the interim, the
 18 Parties are continuing to meet and confer with specific proposals for some
 19 consolidated discovery and potentially other issues, with another meet and confer on
 20 this issue to be held at the time of their Rule 26 conference of counsel in the coming
 21 week(s). The Parties will be working cooperatively to agree on the specific features
 22 of consolidation and intend to submit a proposed order regarding consolidation in
 23 connection with or near the time of their filing of their Rule 26 Joint Report.

24 **II. THE PARTIES’ POSITION REGARDING SPECIAL MASTER**
 25 **APPOINTMENT**

26 With respect to the appointment of a Special Master to handle discovery
 27 disputes, the Parties reiterate their agreement to appoint David Keyzer as Special
 28

1 Master as represented to the Court during the April 21, 2023 Show Cause Hearing
2 [ECF 52]. The Parties will file a draft proposed order appointing David Keyzer as
3 the Special Master presiding over the instant dispute as soon as the Parties receive
4 Keyser's executed declaration confirming that he has run and cleared conflicts.

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7 Dated: May 26, 2023

Respectfully Submitted,

8 **K&L GATES LLP**

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By:/s/ Christina N. Goodrich

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Christina Goodrich
Connor J. Meggs

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Attorneys for Plaintiff Entropic
Communications, LLC

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Dated: May 26, 2023

FISH & RICHARDSON P.C.

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By:/s/Christopher S. Marchese
Christopher S. Marchese

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Attorney for Defendants
DISH Network Corporation;
DISH Network L.L.C.; Dish Network
Service L.L.C.; and
Dish Network California Service
Corporation

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SIGNATURE CERTIFICATION

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Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest
that all other signatories listed above concur in this filing's content and have
authorized the filing.

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/s/ Christina N. Goodrich

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